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*In propria persona.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA**

Jason Crews,

Plaintiff,

v.

The Allstate Corporation,

Defendants.

Case No. 2:25-cv-00572-SPL

**RULE 26(f) JOINT CASE  
MANAGEMENT REPORT**

Judge: Hon. Steven P. Logan

The parties conferred by phone, on May 19, 2025, to discuss the matters set forth in Rule 26(f)(2). Accordingly, the parties submit this Joint Case Management Report.

**1. ATTENDANCE**

The following persons attended the Rule 26(f) meeting and assisted in developing this report:

Plaintiff Jason Crews

Defense counsel Amanda E. Newman

**2. SERVICE**

There are no parties who have not been served or who, having been served, have not answered or otherwise appeared.

**3. NATURE OF THE CASE**

Plaintiff seeks statutory damages for alleged willful violations of the Telephone Consumer Protection Act, 47 U.S.C. § 227 and C.F.R § 64.1200 (the "**TCPA**").

1 Plaintiff's claims relate to approximately nine (9) telemarketing calls allegedly received by  
2 Plaintiff on his cell phone between November 2022 and February 2025. Plaintiff alleges that  
3 Defendant's employees or agents calling on behalf of or at the behest of defendant are  
4 responsible for these calls, which were allegedly made using an automatic telephone dialing  
5 system (ATDS) and/or prerecorded voice without prior express written consent.

6 Defendant denies the allegations in the Complaint and has asserted various affirmative  
7 defenses thereto.

#### 8 **4. JURISDICTION**

9 The Court has subject matter jurisdiction over this action under 28 U.S.C. § 1331  
10 because Plaintiff alleges claims under the Telephone Consumer Protection Act, 47 U.S.C. § 227  
11 *et seq.*

#### 12 **5. ADDITIONS AND AMENDMENTS**

13 The parties do not anticipate adding additional parties or otherwise amend the pleadings  
14 at this time. Defendant reserves the right to move the Court to add additional parties and/or  
15 amend its pleading at a future date.

#### 16 **6. FORTHCOMING MOTIONS**

17 Plaintiff is not presently contemplating a need for either dispositive motions or  
18 evidentiary motions, but reserves the right to pursue appropriate relief following further  
19 investigation and discovery.

20 Defendant may file a dispositive motion as to, inter alia, the unavailability of TCPA  
21 relief against Defendant for alleged calls made by third parties.

#### 22 **7. RELATED CASES**

23 Plaintiff is currently pursuing TCPA claims against other parties in the District of  
24 Arizona, but those cases involve different defendants. Defendants' position at this time is that  
25 Plaintiff's other TCPA suits are not related to this case.

#### 26 **8. DISCOVERY LIMITATIONS**

##### 27 **Plaintiff's Position**

28 Plaintiff does not propose limits on discovery, and request standard limits as prescribed  
in the Federal Rules of Civil Procedure.

1           **Defendant's Position**

2           Defendant does not believe, at this time, that any changes to discovery limitations  
3 imposed by the Federal Rules of Civil Procedure are necessary.

4           **9. ELECTRONICALLY STORED INFORMATION**

5           Plaintiff's Statement: Plaintiff intends to seek ESI in the form of records and documents  
6 which should be readily available to Defendant. Plaintiff will endeavor to limit request in  
7 scope to limit the costs associated with discovery of ESI.

8           Defendant's Statement: No issues related to the preservation, disclosure, or discovery  
9 of ESI have arisen or been discussed to-date. Defendant reserves the right to object to  
10 Plaintiff's future intended requests for ESI records and documents on all applicable  
11 grounds. Defendant also notes it will not produce relevant ESI in this case prior to the  
12 parties reaching agreement on an ESI Protocol and the Court entering an appropriate  
13 Protective Order.

14           **a. ISSUES RELATING TO PRIVILEGE OR WORK PRODUCT**

15           The parties have not yet made any agreement regarding the post-production assertion  
16 of attorney-client privilege or work product protection, but anticipate including such a  
17 provision in their proposed Protective Order.

18           **b. POTENTIAL RULE 502(d) ORDERS**

19           The parties respectfully request the Court enter a Rule 502(d) order permitting the post-  
20 production assertion of attorney-client privilege or protection under the work product doctrine  
21 at the appropriate time.

22           **10. REQUEST FOR JURY TRIAL**

23           A jury trial has been requested and is not contested.

24           **11. TRIAL**

25           The parties anticipate that the case will be ready for trial by May 2026 and that trial will  
26 last three days.

27           **12. EXPEDITED TRIAL ALTERNATIVE**

28           Plaintiff (*a pro se* litigant) certifies that he has considered, and counsel for Defendant  
certifies that she has discussed with her client, the expedited trial alternative.



**CERTIFICATE OF SERVICE**

I hereby certify that on June 23, 2025, I electronically filed the foregoing **RULE 26(f) CASE MANAGEMENT REPORT** with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to the following CM/ECF registrants and mailed and emailed to anyone not registered:

By. /s/ Jason Crews